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IDB GROUP USA INVESTMENTS;
and QUEENSRIDGE TOWERS, LLC

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

PECCOLE-NEVADA CORPORATION, et al.,)	CASE NO.: 2:18-CV-00791-JCM-VCF
Plaintiffs,)	(Consolidated with)
vs.)	CASE NO.: 2:18-CV-00832-APG-GWF
)	CASE NO.: 2:18-CV-00856-GMN-CWH
AMERICAN HOME ASSURANCE)	STIPULATION FOR EXTENSION OF TIME TO FILE OPPOSITION TO AHAC'S MOTION TO TRANSFER TO THE SOUTHERN DISTRICT OF NEW YORK, ETC.
COMPANY,)	
Defendant.)	
)	
AND CONSOLIDATED ACTIONS.)	

In this recently consolidated action, Plaintiffs QT Management and IDB Group USA Investments (collectively, "Plaintiffs") and Respondents American Home Assurance Company ("American Home" and together with Plaintiffs the "Parties"), by and through their counsel, respectfully submit the following Stipulation to allow Plaintiffs until on or before July 16, 2018 to file a Response to American Home's Motion to Transfer to the Southern District of New York or, in the Alternative, to Stay this Action Pending Resolution of a More Complete Action Pending in New York, that was filed on June 22, 2018. American Home shall reply to Plaintiffs' Response within fourteen (14) days after service of the response.

The stipulation is made based on the following facts:

1. On June 22, 2018, American Home filed a Motion to Transfer to the Southern

District of New York or, in the Alternative, to Stay this Action Pending Resolution of a More Complete Action Pending in New York (ECF No. 30) and served a copy thereof on Plaintiffs.

2. Plaintiffs' deadline to respond to American Home's Motion to transfer is July 6, 2018. However, Plaintiffs' counsel will be on a prepaid vacation out of the country from June 30, 2018 through July 9, 2018 and, therefore, will not have sufficient time to prepare a Response before the current deadline. Plaintiffs therefore request an extension of time to file their Response through July 16, 2018.

3. This is the first stipulation for extension of time for Plaintiffs to file a Response to American Home's Motion to Transfer.

4. Good cause for the stipulation exists. The Parties have entered into so-ordered stipulations providing for reciprocal extensions of time in multiple related actions currently pending in Nevada and New York for similar motions to allow for consistency in their arguments. The Parties respectfully request the extension in this action in order to ensure that the Court receives a full and accurate briefing of the motion before it.

IT IS SO STIPULATED.

DATED this 27th day of June 2018

DATED this 27th day of June 2018

MORALES FIERRO & REEVES

HELM & ASSOCIATES

By: /s/ Marc J. Derewetzky

By: /s/ Kevin E. Helm

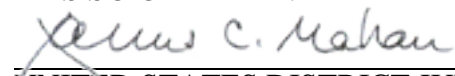
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Attorneys for Respondent/ Defendant
AMERICAN HOME ASSURANCE
COMPANY

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: June 29, 2018